

## MATTIE CONDRAY

---

**From:** Richard Halliburton [rhalliburton@lawmo.org]  
**Sent:** Monday, December 23, 2002 5:48 PM  
**To:** condraym@lsc.gov  
**Subject:** Comments on Notice of Proposed Rulemaking for revisions to Parts 1602 and 1611

Legal Aid of Western Missouri concurs in the comments to the proposed revisions to Parts 1602 and 1611 and commends the Legsl Services Corporation for the many positive changes proposed.

In particular, we wish to strongly support the proposed changes to Sec. 1611.8, eliminating the requirement of a retainer agreement and broadening the circumstances under which groups can be represented. Although we would continue to obtain a signed retainer agreement in each case requiring extended representation, circumstances sometimes preclude obtaining the client's signature timely or at all. Recipients should not be penalized if this occurs.

We do provide legal assistance to a number of community groups and organizations each year, and obtaining the qualifying information from each that was earlier proposed would not only be very burdensome but in some cases would be impossible. The likely result would have been that some potential group clients would have gone without the legal help they needed because they simply did not have the resources to pay private counsel. Group clients are those who often are the most representative of problems affecting large or relatively large segments of the low-income community. Resolution of these problems can result in great benefit to that community in a very effective and efficient way. The proposed revisions will enable staff to determine eligibility quickly and accurately and will resolve many doubts about eligibility that might have lingered under the current or previously proposed language. More cases will be captured for CSR reporting purposes, and, more importantly, more service will be provided to those who would otherwise do without.

Thank you.

Richard Halliburton  
Executive Director, Legal Aid of Western

Missouri